

# **Staff Report**

REVIEW OF ALTERNATIVES ANALYSIS COMMENTS FOR HIGH SPEED RAIL PROJECT

Honorable Mayor and Council Members:

# **Summary**

Staff is seeking City Council approval of a letter to the California High Speed Rail Authority providing comments on the Preliminary Alternatives Report and authorizing Mayor Wozniak to sign the letter.

#### **Background**

The Rail Authority released the Preliminary Alternatives Analysis (AA) Study on April 8, 2010 for the HSR Project. To provide background/context associated with the HSR Project and associated AA study components, an overview is provided as an attachment to this report – see Attachment A.

#### **Discussion**

The Preliminary Alternative Analysis Report contains preliminary planning, environmental, and engineering information used to identify alternatives for the San Francisco to San Jose High Speed Rail Project. Its stated purpose is to identify a range of potentially feasible alternatives for future analysis and consideration in the EIR/EIS.

The preliminary AA Report defines the scope of study for the EIR/EIS, and sets parameters for the next level of design (15%) and environmental analysis. As the engineering and environmental work continues, the Rail Authority and CalTrain will continue to accept comments from the cities on the corridor.

If deemed necessary by the lead agencies, a supplemental AA Report will consider feedback received about the preliminary AA Report and will discuss how the alternatives analysis will inform the detailed engineering, environmental, and outreach activities on the CalTrain Corridor. These activities will inform preparation of the draft EIR/EIS, which is currently scheduled for public release in December of 2010.

Staff has prepared the attached draft letter, which is intended to provide comments on the information provided in the AA and inform the California High Speed Rail Authority of concerns the City has with the project – See Attachment B.

#### **General Plan/Vision Statement**

Review of this matter furthers the City's Vision Statement(s) as follows:

# Distinctive Community Character

- We get involved in town matters because we care about living here.
- Our strong sense of community and enjoyment of the town's assets and activities deepen as we become better informed and connected.

# Fiscal Impact

The City Council previously authorized up to \$10k in resource commitments towards the HSR project. A significant portion of these funds is already accounted for. Staff will be seeking direction as to allocation of additional funds towards this effort.

#### **Public Contact**

Posting of City Council agenda.

# Recommendation

Provide Alternatives Analysis (AA) Report feedback to staff as appropriate commensurate with the issues discussed in this report. Based on Council direction, staff will prepare a final letter to be forwarded to the California High Speed Rail Authority providing the City's comments on the AA Report.

# **Alternatives**

- 1. Approve the draft AA Comment Letter.
- 2. Refer back to staff.
- 3. No action.

#### **Attachments**

A. Overview of HSR Project & Alternatives Analysis Report

B. Draft AA Comment Letter

Carlos de Melo

Acting City Manager

#### **Staff Contact:**

Carlos de Melo

Acting City Manager, Community Development Director

(650) 595-7440

cdemelo@belmont.gov

# ATTACHMENT A Background/Overview of HSR Project & Alternatives Analysis Report

# Background:

The California High Speed Rail system (HSR) is planned to provide intercity, high-speed service on more than 800 miles of tracks throughout California, connecting major population centers. The HSR is envisioned as a state-of-the-art, electrically powered, high-speed, steel-wheel-on-steel-rail technology. The completed system will provide an expected express trip time between Los Angeles and San Francisco of approximately 2 hours and 40 minutes, traveling at speeds up to 200 mph.

In 1993 the State Legislature created the California High Speed Rail Commission (CAHSR), charged with designing a high speed rail system to run between Los Angeles and San Francisco and later to extend to San Diego and Sacramento. Following years of analysis and environmental studies the Commission selected the Altamont Pass-Highway 580 alignment. In 1996 the Legislature replaced the Commission with the California High-Speed Rail Authority (CHSRA) to continue the work begun by the Commission. In its 2008 Program Level Environmental Impact Report (EIR), the Authority abandoned the Altamont Pass alignment in favor of the Pacheco Pass alignment.

In November 2008 California Voters passed Proposition 1A, authorizing the issuance of \$9.95 billion in bonds to study and construct HSR. The measure specified that bond funds may be used to provide only up to one-half of the total cost of construction of each corridor or segment of a corridor - the authority is required to seek private and other public funds to cover the remaining costs. The measure also limits the amount of bond funds that can be used to fund certain preconstruction and administrative activities.

Proposition 1A further specified that \$9.0 billion of the bond funds may be used for environmental studies, planning and engineering, acquisition of rights-of-way, equipment, and construction. The remaining \$ .95 billion (\$950 million) would be available to fund capital projects that improve *other* passenger rail systems in order to enhance these systems' capacity, or safety, or allow riders to connect to the HSR. Of the \$950 million, \$190 million is designated to improve *intercity* rail services, and \$760 million for other passenger rail services including *urban* and commuter rail. No specific allocation of these funds has yet been recommended.

In April 2009 CHSRA and Caltrain entered into a Memorandum of Understanding to share the SF-San Jose Corridor, and in June CHSRA issued a Draft Scoping Report for the San Francisco to San Jose corridor. In August, in response to several law suits challenging the EIR, the court ruled the draft EIR was incomplete, and ordered additional analysis concurrent with continued work on the Alternative Analysis Study. This Revised Draft EIR was released in March 2009, followed in April by publication of the Draft Alternatives Analysis Report.

# **Draft Alternatives Analysis Document:**

The Alternatives Analysis will be used in developing the Project EIR for the San Jose to San Francisco section of the proposed the High Speed Rail system. EIR's generally must include alternatives to proposed projects. This analysis will inform alternatives that will be analyzed in

the Draft EIR. The staging of information with the separate release of the Alternatives Analysis provides our community with an opportunity to communicate our values and concerns related to the alternatives before the Draft EIR is issued, and enhances our ability to influence better outcomes for Belmont. While not clearly stated by the HSRA staff, city staff presumes that the Alternatives Analysis Report (AAR) will be modified based on comments, and incorporated into the Draft EIR, expected to be issued in late 2010 or early 2011. Once issued, the Draft EIR will be circulated and also subject to public comment.

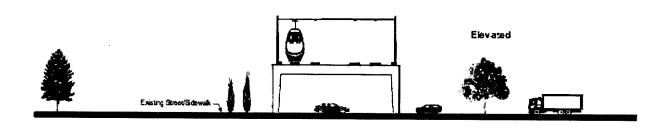
#### Peninsula Corridor:

For the section between San Francisco and San Jose, Caltrain has signed a MOU allowing CHSRA to be share the Caltrain Right-of-Way. The Preliminary Alternatives Analysis Report recommends this route as the preferred HSR alternative on the peninsula. For this shared use to work, Caltrain is planned to be converted to an electrified railway, and the two systems will have potential to share rails in emergency situations. The entire alignment will be a predominantly four-track, grade-separated railroad with HSR operating at speeds up to 125 mph and Caltrain up to 110 mph between San Jose and San Francisco. HSR stations are planned for the San Francisco Transbay Transit Center, SFO Connector Station in Millbrae, and San Jose Diridon, with a potential mid-peninsula station at Redwood City, Palo Alto or Mountain View. The existing freight "spurs" along the corridor will continue to enable diesel freight trains to operate on the corridor between midnight and 5:00 AM as is currently done on Caltrain tracks.

Belmont falls within <u>subsection 4B</u> of the HSR SF-SJ section. The Authority has studied three basic vertical options: elevated, at-grade (existing Caltrain grade), and below grade. The Alternative Analysis further breaks these into six vertical options to better differentiate their constructed characteristics as follows:

- 1. <u>Aerial viaduct</u>: An elevated structure on columns crossing over existing streets

  A heightened Elevation is required to clear a surface street for this alternative, though this option can be combined with a lowering of the undercrossing street to reduce height. Electric poles and catenaries extend 40 feet above the track bed at approximately 70 foot intervals.
  - Easement: **79 feet** (103 ft total with temporary construction easement)
  - Capital cost estimate: \$431 million.



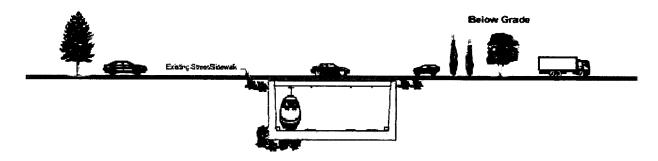
2. <u>Berm or Mechanically Stabilized Earth (MSE)</u>: A large earthen wall, similar to Belmont's current Caltrain elevation from north of the Caltrain station to the San Carlos Border. Electric poles and catenaries extend 40 feet above the track bed at approximately 70 foot intervals. The berm (wall) option does not enhance connectivity and mobility as well as the

aerial viaduct, trench, or tunnel option. There is reasonable concern with this type of structure as it would create a perceived barrier which is not consistent with the local communities' character and land uses. Due to negative response from cities, this option is not being carried forward *except* in Colma and Belmont where Caltrain is already elevated on a berm.

• Easement: **85 feet** (109 feet with Temporary Construction Easement).

• Capital cost estimate: \$229 - \$1,635 million.

- 3. At-grade (existing Caltrain grade): Defined as aligning with the existing Caltrain grade, with Electric poles and catenaries extend 40 feet above the track bed at approximately 70 foot intervals. When the Alternative Analysis refers to "at-grade" options for Belmont, it means atop the current elevated berm. The at-grade option requires surface streets to go either over or under the tracks.
  - Easement: **96 feet** (additional lateral displacement for street undercrossing)
  - Capital cost estimate: \$787 million.
- 4. Open trench: A shallow "box" that is open at the top, and bridged at street crossings, drainage channels, or streams. Where they cross the trench, the structures of these bridged areas would be approximately 10 feet in depth in order to accommodate existing utilities. Electrification lines are concealed within the trench.
  - Easement: **96 feet** (120 feet with Temporary Construction Easement).
  - Capital cost estimate: not disclosed



- 5. <u>Covered trench/tunnel</u>: Similar to Open Trench, but partially covered. Requires fire and life safety systems, with vents and access at regular intervals of approximately 70 feet. The top of the box would be approximately 10 feet below the existing street level, and either partially or fully covered. Because access is required for the fire and safety vents, it is not proposed that this above ground space would be available for any other shared uses.
  - Easement: **96 feet** (120 feet with Temporary Construction Easement).
  - Capital cost estimate: \$1,742 million.
- 6. <u>Deep tunnel (HSR only)</u>: A deep bored tunnel, which cannot be shared with Caltrain. Construction requires large surface areas at the tunnel portals to facilitate construction, and

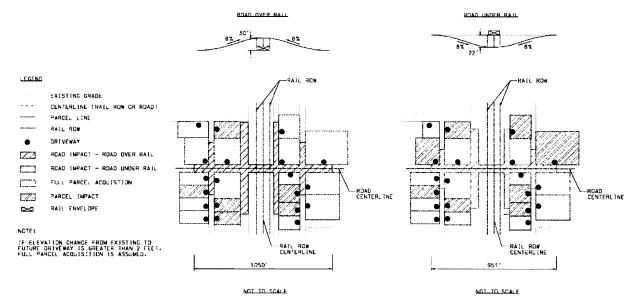
fire and life safety systems are required. The distance required to make the vertical transition from above ground to a tunnel is a consideration. This option requires that a separate but compatible configuration be developed for Caltrain.

- Easement: **96 feet** (120 feet with Temporary Construction Easement). Unknown additional required at tunnel entrance.
- Capital cost estimate: \$1,635 million for HSR only (excludes Caltrain construction if any).

<u>Vertical Transition</u>: Each transition from one vertical solution to another requires approximately 3,000 feet or just over ½ mile, so "quick" adjustments between vertical alternatives are not possible. In order to develop an appropriate and logical cost estimate, all of the 10 subsections of the Peninsula Caltrain corridor must be "stitched" together into a cohesive system from San Francisco to San Jose. This exercise will be part of the 15% design study which is currently underway.

- Minimum grade for HSR service: 1.25% (Desirable), 2.5% (Maximum), and 3.5% (Exceptional).
- Minimum grade for Caltrain (shared with diesel freight trains): 1.0%. Intermediate

<u>Lateral right-of-way requirements</u>: In addition to the allowance for the required easement of each alternative, the right-of-way is impacted by the street profile approaching any required grade separation. A grade separation extending 951 feet to 1050 feet laterally is required to pass a street over or under an 'at grade' rail. This lateral separation can be reduced by partially raising the tracks as Belmont has done at Ralston and Harbor avenues, or by partially or completely lowering the tracks in a trench.



<u>Horizontal Alignment</u>: The Alternatives Analysis describes 4 configurations for the positioning of the 2 Caltrain and 2 HSR lines; HSR inside/Caltrain outside, HSR outside/Caltrain inside, HSR west /Caltrain east, HSR east/Caltrain west. The report does not analyze these alternatives nor make any proposals.

Within the available ROW, the tracks can be shifted to the east or west to reduce impact to adjacent properties or street alignments. Although "quick" adjustments between horizontal alignments are not possible, the location of Belmont on a long, gentle curve provides opportunity to make a minor shift providing it intersects the horizontal alignment at the north and south borders.

<u>Temporary Construction Easements (TCE)</u>: It was assumed that an additional 24 feet easement would be temporarily required during construction of the Aerial Viaduct, Berm, Open Trench and Covered Trench options.

#### Criteria Considered in Evaluation of Alternatives:

Six evaluation measures will be considered in the analysis of the alternatives. These measurements, methods and sources used to evaluate and compare the project alternatives are as follows:

- 1. Alignment and station performance objectives
  - a. Maximize ridership/revenue potential
  - b. Maximize connectivity and accessibility
  - c. Minimize operating and capital costs
- 2. Land Use supports transit use and is consistent with existing, adopted local, regional, and state plans, and is supported by existing or future growth areas as measure by:
  - a. Development potential for TOD within walking distance of station
  - b. Consistency with other planning efforts and adopted plans
- 3. Construction is feasible in terms of engineering challenges and right-of-way constraints as measured by:
  - a. Constructability, access for construction within existing ROW
  - b. Disruption to existing railroads
  - c. Disruption to and relocation of utilities
- 4. Minimize disruption to neighborhoods and communities
  - a. Displacements
  - b. Properties with access affected
  - c. Local traffic effects at stations
  - d. Local traffic effects at grade separations
- 5. Minimize impacts to environmental resources
  - a. Waterways, wetlands, nature preserves or sensitive habitat areas affected
  - b. Cultural resources
  - c. Parklands
  - d. Agricultural lands

- 6. Minimize impacts on the natural environment
  - a. Noise/vibration effects
  - b. Visual/scenic resources
  - c. Avoidance of areas with geologic and soils constraints
  - d. Avoidance of areas with potential hazardous materials

The CSHRA Preliminary Alternatives Analysis also summarizes the evaluation of these objectives and criteria.

#### Costs:

Cost estimates primarily reference the 4-track scenario only, and do not include costs for land acquisition, temporary construction easements, or maintenance facilities. These conceptual-level costs are intended to allow a comparative analysis within each subsection between the numerous vertical options that continue to be studied. The cost for ROW is identified only by order-of-magnitude (high, medium, or low); estimated ROW needs and costs are being developed for options in the 15% engineering design effort.

#### ATTACHMENT B

July 27, 2010



Robert Doty, Program Director Peninsula Rail Program 1250 San Carlos Avenue San Carlos, CA 94705

Subject: City of Belmont Comments on Preliminary California High Speed Rail Alternative

**Analysis Report** 

Dear Mr. Doty:

The City of Belmont appreciates the opportunity to provide comments on the Preliminary California High Speed Rail Alternative Analysis (AA) dated April 8, 2010. The City understands that the Alternative Analysis provides conceptual level engineering information regarding project alternatives and therefore lacks the detailed information on community impacts necessary to adequately compare these alternatives. We expect to see these impacts fully explored in the Draft Environmental Impact Report. Our comments below are subject to revision upon receipt of additional information.

# **Background:**

As part of a comprehensive economic development strategy, Belmont has recently completed a multi-year planning project to create the unified Downtown Village Zoning Districts. The effort began with the identification of four redevelopment sites, three of which adjoin the Caltrain corridor, and led to the rezoning of these target areas to encourage the desired development results. Approximately 80 percent of Belmont's businesses are located within these targeted redevelopment areas or along the adjoining El Camino and Old County Road, all within 100 yards of the Caltrain Right-of-Way. The goal of the District is to promote development and redevelopment, and support future growth and vitality while ensuring that the Villages maintains and strengthens its unique character and sense of place.

The stated purposes of the Village Districts are to:

- 1. Support a thriving, vibrant central business district with a unique sense of place.
- 2. Allow mixed uses to create a more vibrant community and offer additional opportunities for housing for residents requiring convenient access to community. services and transit, and less dependency on auto transportation.
- 3. Ensure that development is visually attractive and features high quality design.
- 4. Preserve and enhance the pedestrian-oriented environment of the Villages area.
- 5. Ensure that potential development and redevelopment is compatible with surrounding land uses and supports the vitality of the area.

Belmont also supports and is participating in the Grand Boulevard Initiative. This project is a collaboration of 19 cities, counties, local and regional agencies dedicated to the revitalization of the El Camino Real corridor, as it runs through San Mateo and Santa Clara Counties. The plan is intended guide the transformation of El Camino Real into a pedestrian and transit friendly, high-performing multimodal arterial where all modes of transportation move efficiently and safely.

In addition, as part of the required update of Belmont's General Plan, the City has recently finalized its 2007-2014 Housing Element. The California State Legislature has mandated that all cities and counties update their General Plan Housing Element every five years, to address their Regional Housing Needs Allocation as assigned by the State. Belmont has been mandated to provide development potential for an additional 376 housing units during this update period, and has pledged specific zoning and policy efforts to accommodate such development. A large percentage of these potential housing development sites fall within 200 yards of the Caltrain ROW.

Although Belmont will not have a HSR station, it is erroneous and inaccurate to state that the HSR land use is consistent with Belmont's adopted plans, or that there will be no impact upon the City's development potential within ½ mile of the ROW. It is critical to Belmont's economic future that any proposed project on the Caltrain ROW is compatible with these ongoing redevelopment plans and policies, and does not restrict Belmont's business and housing opportunities, nor diminish the economic incentive for development in these districts. (See attached Belmont Redevelopment Area Plan map).

#### Framework for Evaluation

In forming a framework in which to evaluate the HSR alternatives, Belmont has drawn upon the following relevant clauses of our Vision Statement:

- Its small-town ambience sets it apart as a tranquil, safe, and desirable place to live.
- We get involved in town matters because we care about living here.
- We connect with each other in all kinds of gathering places.
- Our strong sense of community and enjoyment of the town's assets and activities deepen as we become better informed and connected.
- Our actions today preserve and enhance Belmont's beauty to make it even lovelier for our grandchildren.
- A charming, vibrant town center is the heart of our civic and economic life.
- Our economy prospers with a mix of attractive, successful businesses that fit with our community character.
- We put a priority on getting out of, into, and through town efficiently.
- Bicyclists, walkers, and other non-drivers get where they're going easily and safely.
- We require safe residential streets and smooth-flowing thoroughfares.

# Guiding principles for selection of HSR and Caltrain upgrade Alternative:

Drawing on the Vision statement and the goals of the Downtown Specific Plan, Grand Boulevard Initiative, and Housing Element, Belmont has formulated the following specific principles against which to measure the appropriateness of any High Speed Rail/Caltrain development proposal:

- 1. Preserves Belmont's small town ambience by utilizing high quality design standards consistent with the new downtown zoning ordinance.
- 2. Does not have the effect of dividing our Downtown by creating a visual or physical barrier to pedestrian or vehicle travel between east and west.
- 3. Is appropriately scaled to the height and bulk of surrounding development.
- 4. Does not detract from the ambience and usability of parks and public spaces due to noise, vibration, pollution, or visual blight.
- 5. Provides safe and comfortable pedestrian routes between east and west shopping districts.
- 6. Does not reduce the amount of developed/developable property, or the usability and marketability of such property, due to either expanded right-of-ways or altered traffic access.
- 7. Preserves the ability of businesses to continue operation and survive economically throughout the long term construction of the HSR and Caltrain modifications.
- 8. Does not diminish property values of either commercial or residential properties along the ROW or on nearby hillsides due to increased noise, pollution, vibration, loss of privacy, reduced solar access, or visual blight.
- 9. Does not eliminate housing, or reduce the quality-of-life for sensitive population groups.
- 10. Does not expose our children to increased noise, pollution, or vibration at their schools, which would impact their health or learning experience.
- 11. Does not exceed existing or permitted noise levels, and reduces the level of background noise below existing levels.
- 12. Does not expose residents, especially sensitive populations, to toxic materials during construction, or after from train operation.
- 13. Preserves un-blighted views of the hills from bayside, and views of the bay from the hills.
- 14. Maintains and improves impact traffic flow in and around the Downtown, and provides easy access to adjacent businesses and residences.
- 15. Maintains and improves traffic flow on the primary arteries of El Camino Real, Old County Road, Ralston Avenue and Harbor Boulevard.
- 16. Allows El Camino Real and Old County Road to remain at existing grade, or be returned to natural grade.
- 17. Does not reduce the amount of parking adjacent to commercial areas.
- 18. Retains parking adjacent to Caltrain, to encourage increased Caltrain ridership.

- 19. Retains easy pedestrian and drop-off access to Belmont Train Station from both sides of the tracks.
- 20. Preserves or enhances connectability between Caltrain and Samtrans for both service schedules and location of stops.
- 21. Provides dedicated traffic pullouts for Samtrans bus stops so that traffic is not impeded.
- 22. Does not restrict the flow of Belmont Creek, restrict access for maintenance, nor prevent or interfere with the eventual above-ground redirection through adjacent Firehouse Square.
- 23. Does not impose additional financial burdens on the City to manage construction impacts before or during construction.
- 24. Does not adversely impact existing utilities nor require additional financial burdens of the City to rebuild or upgrade any utility infrastructure.
- 25. Does not adversely impact any historical site or archaeologically significant site.
- 26. Provides enforceable and funded agreements for maintenance of the full length of the right-of-way, including but not limited to trash collection and landscaping maintenance.

#### **Context Sensitive Solutions:**

As HSR planning process moves to the next phase, it is critical that Belmont's overarching principles related to the project be respected, and that the development and implementation of the HSR and Caltrain modifications fully consider the present and future interests of the community and stakeholders. Belmont fully supports the Context Sensitive Solutions framework, and fully expects CHSRA to offer an augmented level of community outreach, communication, and involvement, and to make good-faith cooperative efforts to minimize negative impacts and effects on the communities in which the project will operate.

Request for further analysis of alternatives before settling on a 4-track alternative on the Caltrain ROW. The April 2010 Draft Alternatives Analysis addresses only the construction alternatives on the Caltrain ROW. The preliminary EIR-EIS summarily dismissed alternative routes without fully analyzing the true, total costs and impacts of each route. The City of Belmont believes that alternative routes should be fully evaluated before settling on the Caltrain ROW as the preferred route. A proper alternatives analysis, as required by NEPA (National Environmental Policy Act), requires equal analysis of all alternatives. This should include a thorough and realistic assessment of the total cost (land, construction and mitigation), disruption, and environmental impacts of every corridor to determine which corridor offers the least overall impact. Only then should alternatives for that chosen corridor be discussed.

Altamont Pass: Further ridership studies performed subsequent to the Project Analysis cast doubts on the accuracy of the initial study, in which the Pacheco Pass alternative was selected. It appears that the ridership estimates include a large number of passengers crossing the Bay from Alameda and Contra Costa counties to board HSR in San Francisco. Yet the long range plans for the completed statewide HSR system includes connection to Oakland, and when the HSR line to

Oakland is eventually completed all of these riders will be diverted, reducing the need for the Peninsula-San Jose segment.

East bay corridor from San Jose to Oakland and San Francisco: The initial EIR-IRS Analysis did not address the alternative of sharing the existing Union Pacific freight right-of-way on the east Bay Shore as a route to connect San Jose with San Francisco. This implies that the interests of Union Pacific's property rights carries far greater weight than the interests of peninsula cities' and residents' property rights. Located in predominantly industrial areas, this ROW has several factors in its favor: lower property acquisition costs, less impact on high-density residential areas, connectivity to Amtrak, and access to a larger population, extending into the north and east-bay valleys.

Peninsula Alignment using I-280 or 101 Corridors: The AA analysis provides only a cursory review of these corridors. The presence of tight curves and interchanges were dismissed as insurmountable obstacles, with no further evaluation. Surely the number of freeway overpasses down the length of the peninsula is far fewer than the number of costly and disruptive grade separations that will be required on the Caltrain ROW. The Hwy 101 corridor offers lower residential impacts, lower property values, easier access to both SFO and Mineta airports, and larger parcels of land available for stations and parking. Plus, HSR trains could potentially travel at higher speeds down the freeway corridors than on the Caltrain ROW, thus shortening trip time.

Shared rails on the Caltrain ROW: It is noted that the HSR Operating Plan and Caltrain service plan have not yet been integrated into a single operating plan. HSR and Caltrain need to reconcile their service plans to optimize the alignment and structure configurations. For example, a significant portion of the ridership on the HST between San Jose and San Francisco is likely to be Caltrain riders who will switch to the faster service, thus reducing or eliminating the demand for the Baby Bullet. With station access in San Jose, it is likely that east bay riders will opt to board HSR in San Jose instead of in San Francisco, thus reducing HSR demand on the peninsula corridor. This modal shift needs to be clearly presented in the ridership and scheduling forecasts of Caltrain. This introduces the possibility that a 2 ½ -track or 3-track system of shared rails may be sufficient to provide peninsula commuter traffic along with HSR. The analysis does not address the reasons for selecting a 4-track alternative, nor the potential for the truly shared use of rails, and what this alternative would entail.

Stacked rail models displayed in earlier presentations have not been carried forward for analysis. In a corridor where the ROW is tightly constrained, and property values are extraordinarily high, acquisition and mitigation costs are likely to be a significant percentage of the total project cost. All alternatives that minimize the required ROW and property acquisitions should be evaluated. Although the construction costs are highest, when the savings in property acquisition and mitigation expenses are factored in, stacked models may in fact be the most economical alternative, as well as the best environmental alternative.

Complete and site-specific cost analysis is required: It is impossible to make meaningful comparisons of the various alternatives unless all relevant costs are developed and the total cost

of each alternative, including ROW acquisition costs, is considered. The density of development and the narrow existing ROW, combined with the extremely high land values on the peninsula must be accurately and realistically represented. The use of generalized or average property values is not adequate for comparisons; the localized property values along the rural corridors, the east-bay, the #101 / 280 highway corridors, and the Caltrain ROW vary by an order of magnitude, and must be appraised site-specifically and honestly.

#### Conclusion:

After reviewing each of the six alignment alternatives in relation to Belmont's stated concerns and principles, the City does not support the construction of any above ground alternative. All of the above ground alternatives present far greater adverse impacts which cannot be adequately mitigated including:

- Visual blight of elevated tracks, 40 foot poles, catenaries wires, and high retaining and sound walls.
- Noise and vibration permanently diminishing the usability of vital outdoor community spaces within our downtown core.
- Elimination of businesses along our principle commercial arteries, resulting in permanently reduced tax revenue.
- Permanent loss of desirable sites for much needed housing development.
- Reduction in property values of both businesses and residences, resulting in permanently reduced tax revenue.

Belmont further asserts that, if Context Sensitive Solutions is to be honestly and fully employed, then the alternative which most effectively avoids adverse impacts must be selected even if it involves a somewhat higher initial construction cost.

# Belmont's Requests for Study Within the Draft EIR/EIS

As the Authority moves forward with preparation of the draft EIR/EIS, Belmont is looking for specific analysis of impacts, and proposed mitigation related to the evaluation measures, as outlined in the CHSRA Alternative Analysis – Evaluation Measures:

# Maximize Ridership/Revenue Potential:

- 1. Using revised ridership estimates, provide further analysis of demand levels on alternative routes of Altamont Pass, east Bay Shore, #101 and #280 freeways, factoring in:
  - Larger population growth extending west along Altamont (Dublin Valley, Tracy) than along Pacheco (Gilroy), and greater traffic congestion along Altamont (Hwy 580 is most choked commute in Bay Area).
  - Drawing riders from entire north and east bay area to SF to connect will increase traffic burden on existing roadways and Bart. Providing connection in east bay and Dublin valley reduces burden on transit modes into SF. Given an east bay embarkation, what percent of passengers would embark/disembark there, leaving final segment to SF less demanded.
  - Potential increased ridership from connectivity to Amtrak in Oakland.
- 2. Perform additional ridership study for the Peninsula corridor, factoring in:
  - San Jose station convenience, combined with slower travel time on the peninsula, may draw east bay riders to San Jose, thus reducing demand on peninsula section.
  - Duplication of Caltrain service baby bullet riders will choose HSR, so Caltrain demand reduced.
  - Lower ridership on peninsula may make it feasible to share rails with upgraded Caltrain instead of adding rails.

# Maximize connectivity:

- 3. Provide further evaluation of upgrades and costs needed to effectively connect HSR passengers to:
  - SamTrans
  - Caltrain
  - San Francisco International Airport
  - San Jose Mineta Airport riders to HSR.

#### Minimize operating and capital costs:

4. In order to effectively compare alternatives, Belmont requests complete and site-specific (not averaged) cost estimates of the alternative <u>routes</u> discussed above, as well as the alternative Caltrain alignments, including (but not limited to):

- property acquisition costs for land taken, based on identified parcels
- severance damages for partial takings of parcels
- mitigation payments for adversely impacted properties
- compensation for lost income
- litigation costs
- temporary easements for construction and staging of construction equipment
- shoe-fly tracks
- Costs of constructing or implementing mitigation measures for noise, vibration, tree removal, etc.
- Cost of relocating utilities, historic buildings and archaeological resources
- Associated costs of providing transit connection from HSR to both airports
- Costs of providing connectors and integrated schedules with SamTrans
- 5. Belmont stands to lose significant sales tax revenue and property tax revenue, both short term (due to construction disruption) and long term (loss of business property and diminished property values) as a result of any project on the Caltrain ROW. Provide a site-specific analysis of the potential revenue loss to Belmont for:
  - Lower sales tax revenue during construction due to loss of customers
  - Permanent loss of sales tax revenue due to loss of businesses, and loss of commercial properties
  - Permanent loss of property tax revenue due to loss of properties
  - Permanent loss of property tax revenue due to suppressed values of surrounding properties

Discuss mitigation measures specific to Belmont for these long term revenue losses.

- 6. Accurate maps needed for accurate analysis. The aerial maps presented in the Alternative Analysis appear to both out of date and inaccurate. Caltrain easement lines appear to extend into El Camino, and Caltrain is shown to own parcels known to Belmont to be privately owned. Recent housing development abutting the ROW is not shown on the maps. The City requests that the Authority confer with city staff to identify accurate ownership and easement lines, and complete a parcel-by-parcel inventory of properties abutting the ROW. Only then can accurate costs and impacts be compiled.
- 7. The City cannot bear the burden of ancillary construction management costs such as traffic management and rerouting, citizen advisories, utility service disruption, etc. Include an estimate of these costs relative to construction in Belmont, and provide a policy statement regarding ownership of these costs.
- 8. Belmont seeks to further understand <u>Caltrain</u> project costs beyond those addressed by the construction of HSR. The decision to share the Caltrain ROW has been predicated upon the assumption that Proposition 1A funding would be used to finance the Caltrain upgrades necessary to make the shared ROW work. The costs of upgrading Caltrain exist

independently of the costs of building HSR. Proposition 1A states: "\$950 million in bond funds would be available to fund capital projects that improve other passenger rail systems in order to enhance these systems' capacity, or safety, or allow riders to connect to the high-speed train system". Has there been an analysis of the allocation of this \$950 million amongst the many deserving projects statewide to determine what funding might be available for Caltrain? Provide an analysis of Caltrain project costs over and above HRS costs, and discussion of the source and likelihood of this funding. Include specific details of any costs within Belmont, which might ultimately come to bear upon the city.

# Land Use - consistency with other planning efforts and adopted plans:

- 9. In order to effectively compare alternatives, Belmont requests complete and site-specific analysis of the Land Use Consistency of the alternative <u>routes</u> discussed above, as well as the alternative Caltrain alignments.
- 10. As explained in the preceding response letter, it is vital to Belmont's future that any project on the Caltrain ROW be consistent with the City's adopted plans and policies (and those under consideration). The City has developed principles that address these plans, and requests that the Context Sensitive Solutions process recognize and address the potential impacts and needed mitigation measures relative to each:
  - Belmont General Plan
  - Economic Development Target Area/Village Districts Zoning Amendments (Under Review)
  - Grand Boulevard Initiative plan
  - Housing Element

#### **Constructability – Temporary Impacts:**

- 11. The Alternative Analysis alludes to an additional 24 feet construction easement beyond the alignment. The City requests clarification of the specific placement and nature of construction easements, including:
  - What property takings will be required (in addition to permanent takings)
  - Anticipated closures of Old County Road, El Camino or any cross streets, length of time and extent.
  - How will construction materials and equipment access the site (street routes, anticipated impact on surrounding street/traffic)
- 12. Provide an analysis of construction impacts on Caltrain, and planned mitigation for the following:
  - Relocation and access to stations, duration of displacement
  - Disruption of service schedules, duration of disruption
  - Maintenance of connecting schedules with SamTrans

- Bridge transit required (i.e. busses to connect stations without station access).
- 13. Fully evaluate the specific construction impacts in properties within ½ mile of the site, and discuss and quantify possible mitigation measures for the following:
  - Noise construction hours and days, levels both intermittent and constant
  - Vibration anticipated damage from pile-drivers or excavators on properties within ½ mile of site, financial mitigation.
  - Dust or toxic materials describe suppression and containment measures and propose mitigation for properties suffering from dust/toxic infiltration
  - Apply historical analysis to estimate loss of business due to restricted access, loss of parking, traffic congestion, or unmitigated unpleasant surroundings. Discuss possible mitigation for this loss.
  - Disruption of utility service and mitigation for loss of usability due to outages.
  - Disturbance of Belmont Creek, any flood management / rerouting measures required during construction.
- 14. The City requests a clarification of traffic management policies during construction, including clarification of responsibility for management, communication with City officials, and possible mitigation measures. Traffic congestion quantify anticipated increased delays surrounding construction sites

# Disruption to neighborhoods and communities - Permanent:

**Property Takings:** 

- 15. Business: Provide a detailed, specific list of businesses permanently displaced for the expanded ROW for each alternative, including business nature and volume. As mitigation for permanent loss of businesses, and the associated property and sales tax revenue, Belmont requests RDA funds to develop alternative business sites within the City.
- 16. Housing: Provide a detailed specific list of housing units permanently displaced for the expanded ROW for each alternative.
  - There is a recently completed disabled housing facility with 24 units located adjacent to the ROW (not shown on outdated aerial photos used by AA). These housing units are vital to Belmont's Housing Needs Allocation, and adverse impacts of noise and vibration are unacceptable for this sensitive population. As mitigation, Belmont requests RDA funding to acquire and develop alternative housing at another location within Belmont.
- 17. Number of lost parking spaces for Caltrain, street parking, and any business. The City requests a detailed and quantified analysis of the number and location of parking spaces lost with each alternative. With limited developable land, Belmont's best alternative to mitigate for the loss of parking will be construction of a multi-story parking structure, for which the City would require RDA funds.

- 18. Parks Any expansion on the Caltrain corridor will impact or eliminate Station Plaza. As mitigation for loss of this envisioned meeting/gathering place, the City needs funding to acquire comparable property within the Station District.
- 19. Farmers Market this weekly event, held on the Caltrain parking lot, serves both a vital commercial and social function in the life of the community. It's location in the Village District is vital to attract Sunday customers for local businesses, so relocation outside of the immediate downtown area would have a severe economic impact. The City requests analysis and recommendation of mitigation measures that include provision of an alternative location within the Village District.

#### **Traffic Flow:**

- 20. The intersection of Ralston with El Camino and Old County has been graded at an LOS "F" in terms of traffic flow. Any modifications to this significantly impacted intersection must include mitigation measures to increase traffic flow. The City requests clarification of the impact of each alternative on the profile/elevation of this intersection and abutting businesses.
- 21. The AA indicates a loss of lanes along Old County Road. Any analysis should Identify and evaluate any potential reduction in lanes or lane width on El Camino, Old County Road, Ralston and Harbor avenues, and propose mitigation.

### **Utilities:**

- 22. PG&E Utilities are undergrounded on El Camino Real, and Belmont has recently completed the costly undergrounding of PG & E utilities on Old County Road. Any construction must provide for retaining underground location of these utilities.
- 23. Sewer Belmont is currently undertaking a costly upgrade to its sewer and storm drain infrastructure in conjunction with development of a new sewer treatment facility. Provide a detailed analysis of the construction impacts upon the sewer system, and propose mitigation for any impacts.

#### Environmental resources:

24. Waterways, wetlands, natural preserves or sensitive habitat affected: Provide analysis and propose mitigation for the disruption of Belmont Creek and pumping station. This creek is the collector for runoff from the entire Belmont Valley and canyons, and must be evaluated in terms of both flood control measures and environmental/aesthetic measures. Mitigation measures should be consistent with the City's creek restoration program, include provision for the replacement/relocation of the pumping station, and be consistent with City plans for the eventual 'above-ground' restoration of the creek. Belmont has ongoing projects to improve water management that could be addressed as mitigation.

- 25. There are at least three archaeologically sensitive sites within 100 yards of the Caltrain ROW. The City requests details on preservation steps and mitigation for:
  - Under Station Plaza within 50 feet of the Caltrain tracks lies the buried, and undisturbed remains of remnants of the original building in Belmont; the Belmont Hotel and General Store
  - At both Davy Glen and Twin Pines Park there are Native American village sites

#### **Environmental Measures:**

Noise and Vibration:

- 26. The City requests a thorough analysis of the effects of noise, vibration and pollution on adjacent properties within 100 feet, 400 feet, ¼ mile and ½ mile of the proposed HSR. Many sensitive population groups live within 200 feet of the ROW. In Belmont, a large number of homes are located on adjacent hillsides facing the ROW, where the impact of noise may be intensified, and most of these hillside homes are valued at \$1 million plus. There is a high likelihood that the noise and vibration impacts will adversely impact quality of life as well as property values and marketability of properties. The City requires a thorough analysis of the number and nature of properties, including the number of housing units located within 100 feet, 400 feet, ¼ mile and ½ mile to determine the extent of this impact, and propose mitigation steps. In particular the analysis should quantify, by distance from the ROW:
  - Total number of businesses and housing units
  - Total number of housing units by type (single family, multi family, institutional)
  - Number of special needs residents impacted (senior and disabled)
- 27. Schools: Central Elementary and Nesbit Elementary, with a combined student population of 800 students ages 5-12 are located within 200 yards of the ROW. The impact of noise, vibration and pollution on the both the health and the learning experience of the children must be evaluated and quantified, and parents must be involved in the development of mitigation measures.
- 28. Parks: The City has three existing parks, three planned parks, and two youth sports fields located within 400 yards of the ROW. The City requests a thorough study of the impact of noise, vibration and pollution upon these youth oriented facilities, and the proposal of mitigation measures:
  - Belmont Station Plaza, planned adjacent to the current Caltrain station, will be completely eliminated by any alignment alternative.
  - Firehouse Square and Emmett's Plaza, planned in the Village core, will both be within 50 yards of the ROW, are envisioned to be central plazas, heavily used for casual daily use as well as organized community gatherings and events.

- Twin Pines Park, within 400 yards of the ROW, has playground, amphitheatre, picnic and Senior Center facilities.
- Armstrong Park, within 200 yards of the ROW, has playground, courts, field and picnic facilities.
- Davy Glen Park, within 300 yards of the ROW, provides natural habitat and low impact use.
- Youth sports fields at Central Elementary School and Nesbit Elementary School, both within 300 yards of the ROW, are maintained by the City Parks department. In addition to school use for recess, both are used daily use by multiple sport teams on a year-round basis.

# Change in visual/scenic resources (aesthetic):

- 29. The City of Belmont values and protects views of the hills from below, and views of the bay from the hills. In Belmont, the ROW passes within just ¼ mile of nearby hillsides, the location of high property value homes and open spaces. A clear understanding of the appearance and scale of all alternatives is critical to the City's evaluation of alternatives. This requires at a minimum:
  - Erection of story poles the height and length of the ROW to indicate the elevation of any elevated structure as well as catenaries poles and wires.
  - Rendering of complete illustrations which include accurate depiction of the catenaries
  - Rendering of an elevated structure scaled as it would appear from a nearby hillside, and as it would appear from the street level looking up toward the hills.
- 30. Ralston Avenue is a designated Scenic Roadway, and the visual appearance and scale of any elevated structure crossing this roadway should conform to aesthetic guidelines consistent with the City's village zoning districts. Renderings of each alternative at this grade crossing need to be prepared to make this analysis.

# Avoidance of geological and soil constraints:

31. The EIR/EIS must identify specific areas of suspected liquifaction or soils constraints, determine mitigation measures necessary for construction, and identify additional construction costs required for each proposed alternative.

Maximize avoidance of areas with potential hazardous materials:

32. The EIR/EIS must identify specific sites where suspected hazardous materials are located, the nature of the materials, and the impact of construction disruption of these materials. Mitigation measures should be specific and quantifiable for each alternative.

The City of Belmont appreciates the opportunity to provide these comments on the Alternatives Analysis for the San Francisco to San Jose HSR Project. The City looks forward to working with CAHSR staff on an ongoing basis to review alternatives, impacts and mitigation measures for the project in Belmont.

If you have any questions about this letter, feel free to contact me at (650) 595-7408 or via email at <a href="mailto:cwozniak@belmont.gov">cwozniak@belmont.gov</a>.

Sincerely,

Christine Wozniak Mayor of Belmont